

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jose A. Alcantara, being duly sworn according to law, depose and state as follows:

INTRODUCTION

I, Jose Alcantara, a Task Force Officer with the Drug Enforcement Administration (DEA), Cleveland District Office (CDO), being duly sworn, depose and state as follows:

1. Affiant is currently employed as a Police Officer with the Euclid, Ohio Police Department (EPD), and has been so since July of 2008. Affiant was employed as a Police Officer with the Cuyahoga Metropolitan Housing Authority (CMHA), and was so since July 2002. Affiant has been assigned to the Drug Enforcement Administration (DEA), Cleveland District Office (CDO), as a Task Force Officer (TFO) since January 2021.

Your Affiant

2. Consequently, Affiant is an "Investigative or Law Enforcement Officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7), and is empowered by law to conduct investigations and to make arrests for offenses enumerated in title 18, United States Code, Section 2516.

3. In Affiant's current assignment with the DEA, Affiant has participated in investigations targeting individuals and organizations committing drug trafficking offenses in the Northern District of Ohio and elsewhere. At all times during the investigation described herein, Affiant has been acting in an official capacity as a TFO.

4. This affidavit is being submitted for the limited purpose of establishing probable cause that Raphael J. BROWN age 29, of Cleveland, OH has violated Title 21, United

States Code, Section 841(a)(1) [distribution of controlled substances]. The statements contained in this affidavit are derived from information provided to me by members of the Euclid Police Department and the DEA, as well as my own investigation of this matter. This affidavit does not include every fact known to me regarding this investigation but will seek to summarize relevant information.

PURPOSE OF THE AFFIDAVIT

5. Special Agents and Task Force Officers employed by the Bureau of Alcohol, Tobacco, Firearms and Explosives and Drug Enforcement Administration have been investigating the distribution of controlled substances by BROWN. The investigation has focused on the following:

a. The possession, distribution, and possession with intent to distribute controlled substances and conspiracy to commit these criminal acts, in violation of 21 U.S.C. § 841 and 846.

LOYAL TO BROTHERS (LTB) GANG AFFILIATION

6. Your Affiant has met with investigators with various law enforcement agencies which have provided information of the criminal street gang, identified as Loyal to Brothers or otherwise known as "LTB", which operates as a criminal organization on Cleveland, Ohio's east side of the city. The criminal street gang's area of operation consists of various streets, geographically in the vicinity of East 1 17th Street and St. Clair Avenue, Law enforcement has identified members of the criminal gang and their associates. Members of LTB have been previously convicted for weapons violations, felonious assaults, homicides, and drug trafficking.

FACTS ESTABLISHING PROBABLE CAUSE

7. On February 2024, Investigators installed a surveillance camera at 639 E.117th Street Cleveland, Ohio. Investigators began monitoring and capturing suspected drug transaction occurring in the driveway of 639 E.117th Street.

8. Investigators identified Raphael BROWN as the person residing at 639 E.117th after conducting surveillance of Eric L. POWELL and observing, BROWN and POWELL together in BROWNS' vehicle a 2018 black Cadillac SUV bearing Ohio registration KDN2648.

9. On April 30th, 2024, ATF SA Chris Siebel and John Fisher conducted a 'trash pull' at 639 E.117th Street Cleveland, Ohio. It should be noted that the trash cans were placed on the tree lawn/curb of the residence. While processing the garbage, Investigators recovered the following items, (12) clear plastic baggies (tear offs) and (1) pill bottle. In my training and experience drug traffickers use sandwich bags as one of the many ways of packaging drugs. The "tear offs" are commonly used by drug dealers as a cheaper way to package and distribute their drugs.

10. The evidence recovered from the trash pull was sent to the Cuyahoga County Regional Forensic Science Laboratory for analysis and was found to contain Cocaine residue, Schedule II drug. CCRFSL#2024-003038-0001.

11. On May 14, 2024, Drug Enforcement Administration (DEA) executed a Federal Search Warrant at 639 E.117th Street Cleveland, Ohio. At approximately 6:01 a.m., the EDGE SWAT Team, made entry into 639 E.117th Street and secured the apartment for Investigators. It should be noted Raphael J. BROWN was not present at the time.

11. Upon Investigators searching the residence the following items were located:

- DEA Bag# S001391775 - Multiple bags with unknown residue
- DEA Bag# S001391777 - (2) digital scales and (2) bowls with white residue
- DEA Bag# S001391780 - Kilo wrappers
- DEA Bag# S1391776 - Vacuum sealed bag containing unknown rock-like white powder
- DEA Bag# S001391778 - Red and silver kilo press
- DEA Bag# S001391779 - Baggie with beige powder
- DEA Bag# S001391782 - (4) digital scales with unknown residue
- DEA Bag# S0011706540 - (1) baggie with hard white substance
- DEA Bag# S001706525 - Baggies of unknown beige substance and loose green pill
- DEA Bag# S001706538 - (1) black digital scale w/unknown residue

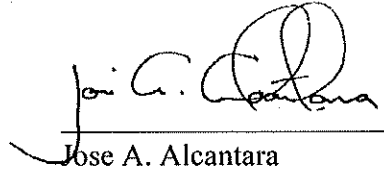
12. On the same date, Investigators transported the evidence recovered at 639 E.117Th Street to the Cuyahoga County Forensic Science Laboratory for analysis and placed a rush on Bag# S001391776.

13. On May 15th, 2024, Investigators received the results for the Vacuum sealed bag containing unknown rock-like white powder, which was found to contain 200.52 grams of Cocaine, Schedule II drug. CCRFSL Lab# 2024-003475-004

CONCLUSION

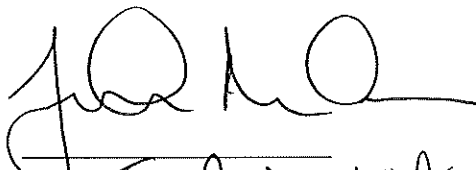
14. Based on my training and experience, Your Affiant believes and assets there is probable cause to believe BROWN violated Title 21 U.S.C. 841, 846, Possession with Intent to Distribute Controlled Substances and Conspiracy to Distribute Controlled Substances.

15. I declare under penalty of perjury that the statements above are true and correct to the best of my knowledge, information, and belief. The above violations were committed in the Northern District of Ohio, Eastern Division. Your Affiant requests that an arrest warrant be issued for BROWN.



Jose A. Alcantara
Task Force Officers
U.S Drug Enforcement Administration

This and the Preceding pages were sworn to and subscribed before me, this 20th day of May 2024. at 11:55 a.m.



~~Magistrate Judge~~ Jennifer Dowdell Armstrong
United States ~~District Court~~ Judge
Northern District of Ohio *Magistrate*

Time: 11:55 a.m.